

Harold R. Jones (State Bar No. 209266)
Swaja Khanna (State Bar No. 334833)
JACKSON LEWIS P.C.
50 California Street, 9th Floor
San Francisco, California 94111-4615
Telephone: (415) 394-9400
Facsimile: (415) 394-9401
E-mail: Harold.Jones@jacksonlewis.com
E-mail: Swaja.Khanna@jacksonlewis.com

Attorneys for Defendants
CUSHMAN & WAKEFIELD U.S., INC. and
KEVIN O'HAIR

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CECILIA VALDOVINOS, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

CUSHMAN & WAKEFIELD U.S., INC. et
al., KEVIN O'HAIR, and. Does 1 through 50,
inclusive,

Defendants.

Case No. 3:21-cv-01924-JCS

**STIPULATION OF DISMISSAL WITH
PREJUDICE**

Complaint Filed: 01/07/2021
Removal Filed: 03/18/2021
Trial Date: 08/22/2022

Plaintiff CECILIA VALDOVINOS and Defendants CUSHMAN & WAKEFIELD U.S.,
INC. and KEVIN O'HAIR (collectively the "Parties") hereby stipulate and agree as follows:

WHEREAS, the Parties reached a settlement of this matter on June 30, 2022;

THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants
through their designated counsel that the above-captioned action should be dismissed with
prejudice in its entirety.

The parties further stipulate that, except as set forth in the June 30, 2022, Settlement
Agreement and General Release and Mutual Release of All Claims between the Parties, the parties
shall bear their own attorney's fees, expenses and costs.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2
3 Dated: July 28, 2022

WORKMAN LAW FIRM, PC

4
5 By: 

6 Robin G. Workman
7 Attorneys for Plaintiff
8 CECILIA VALDOVINOS

9 *Counsel for Plaintiff, Robin G. Workman,
10 authorized submission of her e-signature on this
11 document.

12 Dated: July 28, 2022

JACKSON LEWIS P.C.

13 By: 

14 Harold R. Jones
15 Swaja Khanna
16 Attorneys for Defendants
17 CUSHMAN & WAKEFIELD U.S., INC.
18 and KEVIN O'HAIR

19 The Court having considered the stipulation of the parties, and good cause appearing
20 therefore, orders as follows:

- 21 1. The action is dismissed with prejudice.
- 22 2. Each party shall bear their own costs and attorneys' fees.
- 23 3. The Court shall retain jurisdiction over this matter to enforce the terms of the June
24 30, 2022, Settlement Agreement and General Release and Mutual Release of All Claims.

25 **IT IS SO ORDERED. PURSUANT TO STIPULATION, IT IS SO ORDERED.**

26 DATED: July 28, 2022



27 Honorable Joseph C. Spero
28 United States Magistrate Judge